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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JAMES C. KANG, et. al. on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.; and DOES 1
through 10, inclusive,

Defendant.

PATRICIA BARRERAS, et. al.,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.; and DOES 1
through 10, inclusive,

Defendant.

Case No. 5:17-cv-06220-BLF

Case No. 5:21-cv-00071-BLF

**STIPULATION TO CONSOLIDATE
CASES AND [PROPOSED] ORDER**

(continued from previous page)

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Attorneys for Defendant Wells Fargo, N.A.

1 In response to this Court's March 10, 2021 Order Re Issue To Be Addressed At March
2 18, 2021 Hearing (Docket 100), please be advised that the parties to these proceedings hereby
3 stipulate to consolidate *James C. Kang, et. al. v. Wells Fargo, N.A.* (Case No. 5:17-cv-06220-
4 BLF) and *Patricia Barreras, et. al. v. Wells Fargo Bank, N.A.* (Case No. 5:21-cv-00071-BLF).
5 **IT IS SO STIPULATED.**

6
7 Dated: March 12, 2021

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

8
9 By

/s/ Thomas R. Kaufman

THOMAS R. KAUFMAN

PAUL BERKOWITZ

Attorneys for Defendant

WELLS FARGO BANK, N.A.

10
11
12 Dated: March 12, 2021

STEVENS, L.C.

13
14 By

/s/ Paul Stevens

PAUL STEVENS

Attorneys for Plaintiffs

JAMES C. KANG, MICHAEL MOSES AND

JACQUELINE IBARRA

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16
17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The actions of *James C.*
18 *Kang, et. al. v. Wells Fargo Bank, N.A.* (Case No. 5:17-cv-06220-BLF) and *Patricia Barreras,*
19 *et. al. v. Wells Fargo Bank, N.A.* ("*Ibarra*") (Case No. 5:21-cv-00071-BLF) are deemed
20 consolidated. The Court will not require an amended consolidated complaint but will construe
21 the operative complaints in *Kang* and *Ibarra*, respectively, as one pleading.
22

23 Dated: March 12, 2021

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25 HON. BETH LABSON FREEMAN

26 United States District Judge
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